

August 14, 2020

Jacqueline Kurth, Manager Medical Resource Office P.O. Box 19070 Phoenix, AZ 85005-9070 Email: mro@azica.gov

RE: 2020-2021 Physicians' and Pharmaceutical Fee Schedule Amended Proposed Rule

Dear Jacqueline Kurth:

On behalf of the American Association of Payers, Administrators and Networks (AAPAN), we offer our support and would like to thank you and the Industrial Commission for your continued effort to rein in inappropriate prescribing practices. AAPAN is the national trade association for provider networks, payers, and other Workers' Compensation organizations, including pharmacy benefit managers (PBMs). Through our members, we work on behalf of thousands of injured workers throughout the country, including in Arizona.

Last year, our members stood in strong support of the robust changes that were made in the 2019-2020 Physicians' and Pharmaceutical Fee Schedule Rule. Our members believe that the changes which limited reimbursement for repackaged and physician dispensed medications have helped rein in costs and ensure adherence to the prescription drug formulary. This year's update to the Physicians' and Pharmaceutical Fee Schedule ensures that these protections remain in place.

We look forward to continuing our work with you and your team throughout the remainder of this process. Thank you again for engaging with our members, and please do not hesitate to reach out if we can provide any additional support or information.

Sincerely,

Julian Roberts, President

American Association of Payers Administrators and Networks (AAPAN)

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